

To: Superintendents, Principals, and School Nurses

From: Steve Balko, Director of School Building Security

Date: January 10, 2020

Subject: School Vaccination Coverage Report Card from the Indiana State Department of Health

On December 20, the Indiana State Department of Health (ISDH) distributed a School Vaccination Coverage Report Card to all Indiana school corporations. The report was generated by the data each school submitted into the Children and Hoosier Immunization Registry Program (CHIRP) for students in grades K, 6, and 12.

The Indiana Department of Education (IDOE) realizes that there may be instances where the data within a school's student information system (SIS) does not match the data included in the recent Report Card sent to schools by ISDH. There are many reasons why the CHIRP data might not match the SIS data. A few of these reasons are listed below:

- The Family Educational Rights and Privacy Act (FERPA) prohibits the disclosure of personally identifiable information from education records without the prior written consent of parents (see 34 C.F.R § 99.30). Student's health records, including immunization records maintained by a school or by a school nurse, are "education records" for purposes of the consent requirement. Thus, a school must obtain parent consent before disclosing immunization records maintained by the school to the CHIRP system. Even though a student may be completely immunized, without parent consent, the school cannot input the immunization data into CHIRP or check the box that adds a student's record to the school's roster in CHIRP.
- State law requires that, as of July 2015, any provider who administers an immunization to a person under the age of 19 must enter the immunization into CHIRP within seven days of administration (see IC 16-38-5-2). Thus, it is the expectation that providers are entering the immunization data for Indiana children into CHIRP. In fact, if a school nurse enters an immunization date, and the provider follows up with entering this same immunization, the school nurse's entry is automatically deleted from CHIRP as the provider's entry takes precedent. If a school nurse is aware of a provider who consistently does not enter immunization data into CHIRP, please contact the CHIRP Helpdesk at 888-227-4439 or CHIRP@isdh.in.gov to make them aware of this situation.
- Even though the primary role for school nurses is to deliver direct health care to students, school nurses spend a great deal of their time ensuring students meet the immunization requirements set forth by ISDH as the school nurse checks each student's immunization status for completeness, makes lists and tracks those that are incomplete, notifies parents of any missing vaccines, enters the data into the SIS, follows up with parents a second or third time, and notifies school administrators of those that remain incomplete. Many schools do not have the resources to enter data into their SIS and then again into CHIRP.

IDOE understands and appreciates the importance of having students immunized. As such, IDOE holds schools accountable for ensuring students are immunized as immunization verification is part of the accreditation process under Legal Standard 6: Student Health Compliance. School nurses send immunization data in an aggregated format to IDOE annually by completing the School Health Report. Since this data is aggregated and no personally identifiable information is included, FERPA does not apply. As FERPA does not apply, the School Health Report captures all student data and school nurses are encouraged to share their school's School Health Report with their administrators.

Due to the work done by school nurses, the 2019 school immunization rates for Indiana students as reported to IDOE indicate that 94 percent of Indiana students are completely immunized, 4 percent are in the process of being immunized, 1.7 percent have a religious objection, and 0.3 percent have a medical exemption.

IDOE would like to acknowledge and thank school nurses for all of the work they are doing to ensure Indiana students meet the immunization requirements set forth by ISDH. IDOE recognizes that the overwhelming majority of Indiana students are immunized, schools are in compliance with monitoring the immunization status of students as shown by the annual School Health Report, and as CHIRP may not capture all student immunization data, there may be a discrepancy in the data shown by the school and the ISDH Report Card.

If there are any questions or the Indiana Department of Education can be of assistance, please contact: Steve Balko at sbalko@doe.in.gov or Jolene Bracale at jbracale@doe.in.gov.